

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

---

In re

Duane Oreskovic, Sr.

Debtor.

Chapter 13

23-24034

---

CERTIFICATION REGARDING MOTION TO CONTINUE STAY

---

I, Michelle Oreskovic, hereby affirm that the following is true and accurate to the best of my knowledge:

1. I am the daughter of the debtor in the above-captioned chapter 13.
2. My father had a stroke that has affected his mental and physical faculties.
3. I hold a durable power of attorney over my father allowing me to make financial decisions for him.
4. He previously filed a Chapter 13 on **April 12, 2022**, case number **22-21561**, which was pending in the last year before the filing of this case; that case was dismissed **October 26, 2022**.
5. That case was dismissed for his failure to make plan payments.
6. My father's social security has increased significantly since his last case.
7. I have also convinced my father to sell or surrender his main residence.
8. The combination of his increase in social security and sale/surrender of the main residence will ensure that his current Chapter 13 plan payment is affordable.
9. I have taken over responsibility for my father's finances so I can ensure that his monthly bills (including his Trustee payment) are paid.
10. That my father's counsel will be filing a motion to appoint me as my father's guardian or next of friend under Bankruptcy Rule 1004.1 so that I may act on his behalf.
11. This petition was filed in good faith and I believe that my father will be able to afford my monthly Trustee payments and complete the terms of the Chapter 13 Plan.
12. My father needs to file this Chapter 13 in order to save his rental property from tax foreclosure.
13. I certify under the penalty of perjury that the foregoing is true and correct.

Dated this 8<sup>th</sup> day of September, 2023

/s/ Michelle Oreskovic  
Michelle Oreskovic